

DOCKET FILE COPY ORIGINAL

RECEIVED

LAW OFFICES

AUG 22 1997

COHN AND MARKS

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

JOEL H. LEVY
ROBERT B. JACOBI
ROY R. RUSSO
RONALD A. SIEGEL
LAWRENCE N. COHN
RICHARD A. HELMICK
WAYNE COY, JR.
MARK L. PELESH
J. BRIAN DE BOICE
EDWARD N. LEAVY

SUSAN V. SACHS
JOHN R. PRZYPYSZNY
KEVIN M. GOLDBERG
MICHAEL A. MCVICKER
SHARON H. BOB, PH.D.
HIGHER EDUCATION
SPECIALIST ON
POLICY AND REGULATION

SUITE 600
1333 NEW HAMPSHIRE AVENUE, N.W.
WASHINGTON, D.C. 20036-1573

TELEPHONE (202) 293-3860
FACSIMILE (202) 293-4827
HOMEPAGE WWW.COHNMARKS.COM

OF COUNSEL
MARCUS COHN
LEONARD H. MARKS
STANLEY S. NEUSTADT
RICHARD M. SCHMIDT, JR.

DIRECT DIAL: (202) 452-4836
INTERNET ADDRESS:

August 22, 1997

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

**Re: Supplement to Petition for Reconsideration
MM Docket No. 87-268**

Dear Mr. Caton

Transmitted herewith, on behalf of Bowling Green State University, a Petitioner for Reconsideration in the above-referenced matter, are the original and five (5) copies of its Supplement to that Petition.

Should you have any questions with respect to this filing, please contact the undersigned.

Very truly yours

Wayne Coy, Jr.

Enclosure

No. of Copies rec'd 015
List A B C D E

DS1/39532-1





RECEIVED

AUG 22 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

August 21, 1997

Tucker Center For
Telecommunications

Bowling Green
State University

Bowling Green, OH
43403-0060

Phone: 419-372-2700

Fax: 419-372-7048

info@wbgu.bgsu.edu

<http://www-wbgu.bgsu.edu>



Secretary
Federal Communications Commission
Washington, D. C. 20554

Dear Mr. Secretary:

The attached engineering statement of John F. X. Browne & Associates, P.C. constitutes the supplementary statement regarding the "Petition for Reconsideration" of Bowling Green State University.

Sincerely,

Patrick T. Fitzgerald
General Manager



ENGINEERING STATEMENT
in support of
Supplement to Petition for Reconsideration
Bowling Green State University
WBGU-TV
Bowling Green, OH

Bowling Green State University (BGSU) of Bowling Green, Ohio, is the licensee of WBGU-TV, Channel 27. BGSU has been allotted Channel 56 for its DTV operations but is concerned that interference in a major portion of its service area will adversely affect its ability to provide DTV service to its viewers.

Adjacent-Channel Interference

The WBGU-TV transmitter is located approximately 25 miles southwest of its principal city of Bowling Green, OH. From this location, it provides Grade A and "City" Grade service to the area of Lima, OH. WBGU is a key station in the network of Ohio public television stations which provides programming to virtually all residents of the state of Ohio; Lima, OH, is one of the areas for which WBGU is the primary source of public television programming and it is the largest city served by WBGU.

The Commission has allotted Channel 57 to WTLW, a commercial television station serving Lima, OH. The reference coordinates for WBGU-DT and WTLW-DT place the facilities 47.7 km apart; Section 73.623(d) of the Commission's rules relating to DTV spacing requirements precludes adjacent-channel allotments (in Zone I) at separations between 40.2 and 96.6 km. Thus, the separation here

(47.7 km) would not meet the requirements for a new adjacent-channel allotment. Furthermore, Section 73.623(c) of the rules specifies a protection ratio of -43 dB [upper (57) into lower (56)] for determining whether interference will exist between adjacent DTV channels.

The WTLW transmitter is situated at the WBGU-TV 80 dBu NTSC "City Grade" contour, a few miles WNW of Lima; this would also be the site of WTLW-DT. The -43 dB D/U objective relative to WBGU will not be met in an area estimated to be in excess of 180 sq. km, an area which encompasses the entire city of Lima.

Thus, it must be concluded that the DTV allotment for WBGU-TV falls far short of meeting a stated objective to replicate its present service area when the largest city in that area – which presently receives city grade and grade A service – cannot be served due to adjacent-channel interference^{1/}.

Alternatives

A study was conducted to identify a substitute channel for WBGU-DT using guidance from the rules and OET-69. No alternative core channel could be identified which would not create new interference to an existing NTSC station or proposed DTV allotment.

A study was conducted to determine whether an alternative channel would be available to substitute as the allotment for WTLW-DT. Several channels including 23, 32, 47 and 48 appear to be candidates for the WTLW-DT facility. Allotment of any of these would resolve the issue of interference to WBGU-DT. Since WTLW-DT would have to move back into the core at the end of the transition period given its present allotment, a re-allotment at this time would save the expense and inconvenience of having to make that change later. Perhaps Channel 47 would be an appropriate DTV allotment given WTLW's present NTSC operation on Channel 44.

^{1/} Of course, WTLW-DT will receive similar interference from the WBGU-DT transmitter; however, this interference will be largely in a sparsely populated area with much less impact in terms of lost population.

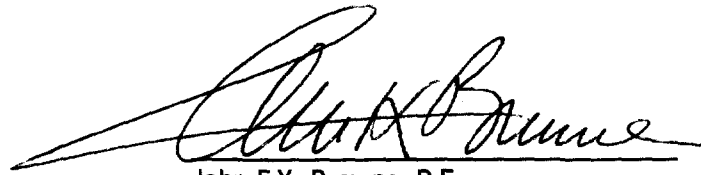
B

Conclusion

The Commission must give urgent consideration to this apparent problem including changing the allotment of WTLW-DT or WBGU-DT to eliminate the adjacent-channel relationship which will destroy the WBGU-DT service in the largest city it serves.

Certification

This statement was prepared by me or under my direction. All assertions contained in the statement are true of my own personal knowledge except where otherwise indicated and these latter assertions are believed to be true.

A handwritten signature in black ink, appearing to read "John F.X. Browne", written over a horizontal line.

John F.X. Browne, P.E.
August 21, 1997